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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA

: CRIMINAL COMPLAINT

v.

:

STEVE GONI

: Mag. No. 11-6222 (MAS)

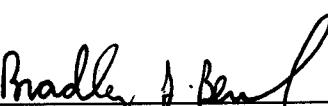
I, Bradley J. Benwell, being duly sworn state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

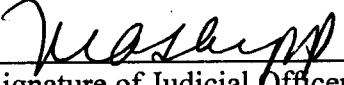
continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
Bradley J. Benwell, Special Agent  
DHS-ICE

Sworn to before me and subscribed in presence,

December 16, 2011, at Newark, New Jersey

HONORABLE MICHAEL A. SHIPP  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

From at least as early as on or about March 19, 2010 through on or about September 24, 2010, in Morris County, in the District of New Jersey, and elsewhere, defendant STEVE GONI did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and Title 18, United States Code, Section 2.

**ATTACHMENT B**

I, Bradley J. Benwell, am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Based on their review of the web access logs of an Internet website offering child pornography (hereinafter, the "Child Porn Website"), law enforcement officials determined that on or about March 19, 2010, an individual using an Internet Protocol Address ("IP Address") registered to a STEVE GONI at an address located in Mine Hill, Morris County, New Jersey, obtained numerous visual depictions of minors engaged in sexually explicit conduct, including enlarged (full size) images of child pornography, from the Child Porn Website. Enlarged (full size) images of child pornography are obtained from the Child Porn Website by a user clicking on the thumbnail image. The thumbnail images, as displayed, were of sufficient size for a user to identify the nature and content of the images.

2. The following are three examples of the files that the individual using the IP Address accessed and received, or attempted to receive, from the Child Porn Website on or about March 19, 2010:

FILE NAME	DESCRIPTION	FILE DOWNLOAD DATE
/ps/src/1268957091316.jpg	This image depicts a naked prepubescent female posing in a sexually explicit manner. It is seen from an overhead viewpoint. The prepubescent female is visible from the top of her head to her toes. She is lying on a brown sofa that is covered by two multicolored blankets. The back of the sofa is draped with a black and orange Harley Davidson blanket. There also is a date stamp in the lower right corner of the image that reads "4/29/2000."	03/19/2010 11:22:49 -0400
/hg/src/1269006877244.jpg	This image depicts a naked prepubescent female posing in a sexually explicit manner. It is seen	3/19/2010 11:29:59 -0400

FILE NAME	DESCRIPTION	FILE DOWNLOAD DATE
	from frontal viewpoint. The prepubescent female is sitting on a bed covered by a white sheet and is naked except for a black and gray sock on her right foot. The prepubescent female is in the act of inserting an orange colored object into her vagina.	
/hg/src/1269006565194.jpg	This image depicts a naked prepubescent female posing in a sexually explicit manner. It is seen from a frontal viewpoint. The prepubescent female is naked and visible from her head to her feet. Her hands and feet are behind her back balancing her above a white bath tub. Behind her is a white tile wall with multi-colored pictures depicting a sea horse and a fish. The prepubescent female has her legs spread exposing her genital area and she appears to be in the act of urinating.	3/19/2010 11:29:50 -0400

3. On or about June 27, 2011, law enforcement executed a federal search warrant for the residence of STEVE GONI at 17 Dickerson Mine Road, Mine Hill, New Jersey ("the Residence"). During the execution of the search warrant, law enforcement agents determined that STEVE GONI and his wife were the only individuals living at the residence.

4. Law enforcement agents interviewed STEVE GONI, who admitted, in substance and in part, that: (1) he had accessed websites offering child pornography; (2) on those websites, he observed child pornography; and (3) child pornography was downloaded onto his computer.

5. During the search of the Residence, law enforcement seized two laptops: (1) HP Pavillion dv6; and (2) HP ZE4430US (hereinafter, collectively, "the Computers") from the Residence. Law enforcement has found evidence revealing the ownership and/or use of the Computers, including, but not limited to, files related to STEVE GONI's landscaping business, which were saved on the Computers.

6. Examination of the Computers seized from the Residence further revealed that image and video files containing child pornography were located on the Computers, in the

downloads folder for user "steve alexander goni." Three of the image and/or video files are described below:

FILE NAME	DESCRIPTION	FILE DOWNLOAD DATE
Masha 15.jpg	<p>This image depicts a prepubescent female posed in a sexually explicit manner. The image is photographed from a frontal viewpoint. The prepubescent female is fully nude and visible from the top of her head to her feet. She is standing on a brown wood floor in front of a light blue colored wall with a partially opened window. There are two tables placed against the wall, behind the female, one on the left and the second, containing a computer and keyboard, on the right. She is partially sitting on the table on the left, exposing her genital area. Her right arm is slightly bent and extends to her side resting on the same table that she is sitting on. Her left leg is extended horizontally and rests on the table to the right, which contains the computer and keyboard. Her left hand is placed on the table near her hip and behind her left leg.</p>	<p>09/24/2010 11:35:42 (2010-09-24 15:35:42 UTC)</p>
Masha 20.jpg	<p>This image depicts a prepubescent female performing oral sex on an adult male. It is depicted from the side viewpoint. Both actors are naked and standing in front of a wood door with a brass colored door knob. The prepubescent female is visible from the top of her head to her knees. The adult male is visible from the mid abdomen to the mid thigh region. His right foot is also visible. The male's left hand is placed on the head of the prepubescent female. The prepubescent female is holding the erect penis of the male with both hands and the tip of the penis is in her mouth.</p>	<p>09/24/2010 11:35:42 AM (2010-09-24 15:35:42 UTC)</p>

FILE NAME	DESCRIPTION	FILE DOWNLOAD DATE
Coolsex.wmv	This video is 1:21:03 in length and depicts a prepubescent male engaged in sexual intercourse with a pubescent female. At approximately 5:00 into the video, the prepubescent male is naked. At approximately 12:31 into the video, the prepubescent male engages in vaginal intercourse with the pubescent female and continues for the remainder of the video.	11/30/2010 5:44:45 PM (2010-11-30 22:44:45 UTC)

7. Based upon my education, training, and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the images of child pornography described above in paragraphs 2 and 6, based upon their location and method of storage on the Computers, were shipped and transported in and by a facility of interstate commerce, including by computer.